

EXHIBIT A

Ullman, Emily

From: David Cohen <david@davidrcohen.com>
Sent: Thursday, October 08, 2020 4:37 PM
To: Ullman, Emily; Thomas Bilek
Cc: David R. Cohen (David@SpecialMaster.Law); mdann@dannlaw.com; xOpioid NAS
Subject: Re: NAS Opposition to Class Cert: Sealing

EXTERNAL

External E-mail

That is fine. I will take care of it from there.

sent from my cell phone
David R. Cohen

From: Thomas Bilek <tbilek@bileklaw.com>
Sent: Thursday, October 8, 2020 2:58:53 PM
To: Ullman, Emily <eullman@cov.com>
Cc: David R. Cohen (David@SpecialMaster.Law) <david@specialmaster.law>; mdann@dannlaw.com
<mdann@dannlaw.com>; xOpioid NAS <xOpioidNAS@arnoldporter.com>
Subject: Re: NAS Opposition to Class Cert: Sealing

Ms. Ullman has correctly stated the agreement of the parties. Feel free to contact me in you have any questions.

Tom Bilek

Sent from my iPhone

On Oct 8, 2020, at 11:36 AM, Ullman, Emily <eullman@cov.com> wrote:

Special Master,

The parties wanted to reach out in advance of tomorrow's filing of the opposition to Plaintiff's motion for class certification to ask how we should handle confidential medical information contained in that opposition. Specifically, Defendants will include in their opposition information from plaintiffs' medical records, plaintiff fact sheets, and interrogatory responses, and also intend to attach those materials as exhibits. We understand that plaintiffs have marked this material confidential and because it is personal medical information we do not object to keeping it sealed, although plaintiffs have of course not yet had the chance to review the exact content.

The last time we faced this issue, in the filing of the opposition to a class representative's motion to intervene, you permitted us to follow the following procedure:

Defendants will file a redacted copy of the brief on the docket tomorrow as well as all non-confidential exhibits. We would then email you and Plaintiffs the full, unredacted materials and exhibits. (Is there a chambers address we should include on this email as well?) Plaintiffs would have a chance to review the materials and let us know by Tuesday if they wish to keep the redacted information under seal, and we would then file an unredacted version of the brief and exhibits under seal with an accompanying motion next Friday.

Please let us know if this is acceptable to you this time as well, or if you would like us to alter anything. We appreciate your consideration.

Best,

Emily

Emily Ullman

Pronouns: She/Her/Hers

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